

3

3

1

3.1 Incorrect Information

2

**3.2 Incorrect Fix
Incorrect Location**

3

**3.3 Common Carrier
Bureau update**

4

5


Environmental Management, Inc.
P.O. Box 700
Guthrie, OK 73044-700

Fax Transmittal
405.282.8533

To: Ms. Phyllis Mitchell

Company: SWB

Fax No: 314-331-2551

From: Gene Spineto  **Ph. 405-282-8510** Gspineto@emiok.com

Total number of pages including this cover page: 9

Date: 8-2-00

Time:

If pages are missing or unreadable please call 405.282.8510.

Comments: This is in reference to your phone call today about FCC informal complaint 99-C833. Your first comments to the FCC complaint information was way off, as we both discovered with our short discussion. The following pages are some of the 26-page packet filed with the FCC about the lack of diversity circuit routing (which is non-industry standard), single master CO design configuration (a non-industry standard) and other issues.

Please note the different SBC Final Service Disruption Reports for a smaller less impacting outage: "steps taken to prevent recurrence" of 98-189 and 98-204. Note: SBC report 98-189 did not cover all E911 (safety of life) issues.

Ms. Mitchell, thank you for the phone call today about the FCC complaint that could not be corrected at the local SWB level. Please provide your office phone number and title, I failed in our first conversation to ask for this, sorry.

Sincerely, Gene

**E.M.I. has the nation's largest environmental emergency response
sub-contractor network.**

Barbara J. Reaves
Corporate Manager -
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W.
Suite 1100
Washington D.C. 20005
Phone 202 326-8852
Fax 202 789-5319

98-1



Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

December 18, 1998

Mr. Dale Hatfield
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Room 480
Washington, D.C., 20554

Re: Final Service Disruption Report

Dear Mr. Hatfield:

Pursuant to the requirements established in the Report and Order in CC Docket No. 91-273 (Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions), **Southwestern Bell Telephone Company** submits the attached **Final Service Disruption Report** associated with a service disruption at North Central Oklahoma, on November 18, 1998.

An Initial Service Disruption Report was faxed to the FCC's Monitoring Watch Officer on that date.

Please stamp and return the provided copy to confirm your receipt. Please contact me if you have questions regarding this service disruption.

Sincerely,

A handwritten signature in cursive script that reads "Barbara J. Reaves".

Enclosures

CC: Bob Kimball

**Southwestern Bell Telephone**98-189
Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Retention Period: 6 Years

FCC SERVICE DISRUPTION REPORT☐ Initial Report☐ Update☒ Final**OCCURRED: DATE: 11/18/98****TIME: 16:58 CST**☒ 50,000 or More Customers☐ 30,000 - 49,999 Customers**ENDED: DATE: 11/18/98****TIME: 21:54 CST**☐ Special Offices/Facilities**GEOGRAPHICAL AREA AFFECTED: North Central Oklahoma****ESTIMATED CUSTOMERS AFFECTED: 121,140****TYPE(S) OF SERVICE AFFECTED: IntraLATA, InterLATA, 800, Interexchange, Switched Access, Cellular and E911****ESTIMATED BLOCKED CALLS: 393,895**

CAUSE OF THE DISRUPTION: At 16:58 CST, on Wednesday, November 18, 1998, Allen Construction Incorporated damaged two fiber toll cables ½ mile North of the Oklahoma City Greenfield Central Office. The fiber toll cables provide toll access for customers in 25 Southwestern Bell Telephone and 15 Independent Company Central Offices north of Oklahoma City. Allen Construction, Inc. was using a trackhoe to tear out a bridge wing wall when they damaged the underground conduit system that contained the fiber toll cables. Allen Construction, Inc. was working on a road construction project for the State of Oklahoma when they damaged the cables. The cables were accurately located and marked per Southwestern Bell Telephone directives.

There was local media coverage of the event. The City of Guthrie Police Department E911 Public Safety Answering Point (PSAP) was affected by the outage. There were no known life threatening events that occurred during the outage.

Root Cause of the outage is Cable Damage – Digging Error.

NAME AND TYPE OF EQUIPMENT INVOLVED: Fiber Optic Cables**SPECIFIC PART OF NETWORK INVOLVED: Toll Network**☐ Official File Copy, If Checked in RedSW-1414
(Rev. 3-93)

OK 1/1

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

BEST PRACTICES: Best Practices covering this outage are contained in Section A of the Network Reliability: A Report to the Nation - Compendium of Technical Papers, dated June 1993, and Keeping the Network Alive and Well document from ATIS, dated February 1996. Southwestern Bell Telephone observes those practices that are consistent with providing outstanding customer service.

METHODS USED TO RESTORE SERVICE: Cables were exposed and spliced with mechanical connectors. One cable also suffered an open splice 1/2 mile from the damage site. Service on the cable with the open splice was patched to the other cable.

STEPS TAKEN TO PREVENT RECURRENCE:

1. A claim for damages was processed and Allen Construction, Inc. was rendered a bill.
2. A meeting to discuss "Cable Damage Prevention" initiatives was held with Allen Construction, Inc. by Southwestern Bell Telephone personnel.
3. The Southwestern Bell Telephone cable locate contractor has an employee assigned to the project who will be on site whenever there is construction activity near the fiber optic toll cables.

PREPARED BY: Jim Lankford
DATE SUBMITTED: 12/17/98

TELEPHONE: 210-886-4589
TIME: 10:30 CST



Barbara J. Reaves
Corporate Manager -
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W.
Suite 1100
Washington D.C. 20005
Phone 202 326-8852
Fax 202 789-5319

98-2041
Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

December 23, 1998

Mr. Dale Hatfield
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Room 480
Washington, D.C., 20554

Re: Final Service Disruption Report

Dear Mr. Hatfield:

Pursuant to the requirements established in the Report and Order in CC Docket No. 91-273 (Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions), **Southwestern Bell Telephone Company** submits the attached **Final Service Disruption Report** associated with a service disruption at **Tyler, Texas on December 9, 1998.**

An Initial Service Disruption Report was faxed to the FCC's Monitoring Watch Officer on that date.

Please stamp and return the provided copy to confirm your receipt. Please contact me if you have questions regarding this service disruption.

Sincerely,

Barbara J. Reaves

Enclosures

CC: Bob Kimball



Retention Period: 6 Years

FCC SERVICE DISRUPTION REPORT

☐ Initial Report

☐ Update

☒ Final

OCCURRED: DATE: 12/09/98

TIME: 09:31 CST

☒ 50,000 or More Customers

☐ 30,000 - 49,999 Customers

ENDED: DATE: 12/09/98

TIME: 12:40 CST

☒ Special Offices/Facilities

GEOGRAPHICAL AREA AFFECTED: Tyler, Texas

ESTIMATED CUSTOMERS AFFECTED: 86,139

TYPE(S) OF SERVICE AFFECTED: IntraLATA, InterLATA, Interexchange, Switched Access and E911

ESTIMATED BLOCKED CALLS: 201,884

CAUSE OF THE DISRUPTION: At 09:31 CST, on Wednesday, December 9, 1998, Red Simpson, Incorporated damaged a fiber toll cable in conduit while using an auger to place a power pole for TU Electric at the intersection of Fair Lane and Sunnybrook in Tyler, Texas. The fiber toll cable provides toll access for customers in 3 Southwestern Bell Telephone and 1 GTE Central Office in east Texas. In addition, the GTE Central Office serves as the E911 Tandem for GTE offices in east Texas.

A cable locate had been requested and a copper cable was located by SM&P (Southwestern Bell Telephone cable locate contractor). However, they failed to locate and mark the conduit run that contained the fiber toll cable.

There was local media coverage of the event. There were 16 Public Safety Answering Points (PSAP's) affected by the outage. 911 calls were automatically transferred to 7 digit numbers, per GTE Contingency Plans, for those GTE offices that had that capability. There were no known life threatening events that occurred during the outage.

Root Cause of the outage is Cable Damage due to Cable Unlocated (Dig-Up)

NAME AND TYPE OF EQUIPMENT INVOLVED: Fiber Toll Cable

SPECIFIC PART OF NETWORK INVOLVED: Switched Access and E911

BEST PRACTICES: Best Practices covering this outage are contained in Section A of the Network Reliability: A Report to the Nation - Compendium of Technical Papers, dated June 1993, and Keeping the Network Alive and Well document from ATIS, dated February 1996. Southwestern Bell Telephone observes those practices that are consistent with providing outstanding customer service.

METHODS USED TO RESTORE SERVICE: Damaged fibers were fusion spliced.

STEPS TAKEN TO PREVENT RECURRENCE:

1. A claim for damages was processed and SM&P was rendered a bill.
- 2. A diversity route was evaluated, approved and an economic decision will be made when to fund the project.
3. A partnership was agreed to by Southwestern Bell Telephone management and SM&P whereby a Southwestern Bell Telephone manager would ride with new SM&P locators to insure they knew what where considered "high profile" cable routes.

PREPARED BY: Jim Lankford
DATE SUBMITTED: 12/22/98

TELEPHONE: 210-886-4589
TIME: 09:00 CST



Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

May 3, 1999

Commissioner Denise Bode
Oklahoma Corporation Commission
2101 Lincoln Blvd
Oklahoma City, OK 73105

Subject: Request for a Meeting on Telecommunications outage and Oklahoma's Future Business Communication Infrastructure Opportunities.

Reference: Governor Keating Letter March 3, 1999, (Eric J Polak) in response to Environmental Management, Inc. (E.M.I.). Letter dated February 9, 1999, regarding Telecommunications Outage November 18, 1998 (attached).

Commissioner Bode:

After quickly reviewing the FCC regulations and Telecommunications Standards adopted by the Telecommunications Industry, it has become very evident that Oklahoma has not met the standard design requirements as other states. With the Network and Telecommunication Revolution in its beginning phase, Oklahoma enjoys a strategic position of great opportunity. Oklahoma's plan ("Building a Better Oklahoma") combined with its geographic location makes our state an attractive location for new businesses and opportunities for the existing business base. This would be a great opportunity for Oklahoma to lead the other states in Telecommunications Infrastructure. The main new marketing addition will be Business Telecommunications Networks Infrastructure, a terrific addition to the present Oklahoma marketing campaign.

To take advantage of this, the state needs to lead and coordinate the planning. (A competing out of state Telecommunications / Network company will naturally have goals that have a different alignment setting than Oklahoma's plan for the future.) To keep the playing ground equal between competing companies and still obtain and improve the standard Telecommunications Networks Infrastructure will require the Corporation Commission's leadership.

Many businesses depend on 24 hour communication and are required by law to have backup systems (Banks, Hospitals, and 911) and in the case of E.M.I. we have contractual commitment to our customers for emergency nation-wide environmental response. Following the Telecommunications industry established standards (FCC, ANSI, ATIS and T-1) will provide for improved Telecommunication service and assurance of reduced major life threatening outages.

When can we meet to address questions you may have, and discuss a comprehensive plan?

Sincerely,

Gene Spineto
Telecommunications Manager



E.M.I.

Post Office Box 700
Guthrie OK 73044-0700
(405) 282-8510



Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

9 February, 1999

Attorney General
Drew Edmondson
Room 112
State Capitol
Oklahoma City, OK 73105

Secretary of State
Tom Cole
Room 101
State Capitol
Oklahoma City, OK 73105

Request an Oversight Committee be established to ensure that Civil Defense communications and business contingency communications requirements are being complied with by the phone companies.

Gentlemen:

With the recent landline phone outage on Nov 18, 1998 it was discovered that even cell phone, mobile phone and 911 service was disabled from Edmond to Black Well. The actual fiber line cut took place by Remington Park, well South of Edmond. This terminated all types of phone service, including within the same prefix areas for over three hours. Basic planning requirements should have never allowed this type of single tread design to take place.

Federal Contingency Planning and Civil Defense requirements must have been over looked. Combine this with the different competing phone companies and you will continue to have independent single tread type routing design problems. Eventually it will cascade to larger sustained outages that will have far reaching impacts to basic life emergency services.

To improve Oklahoma's Emergency and Business posturing, recommend the Oversight Committee establish regular-scheduled meetings to review outages and to insure compliance with Oklahoma's Master communications plan.

The Committee would be composed of Civil Defense, Law enforcement, 911 and business personnel. Each communications company would be required to participate. Attendance to the meetings would be open to business and government agencies.

This could be the nation's first; Oklahoma could take the lead in assurance and coordination of its communication to the businesses and State Governments.

There have been a total of four Meetings since the outage. With SWB, Logan County Civil Defense, Guthrie Police and Environmental Management Inc (Nation wide provider of 24 Hr emergency response clean up service). Everyone is trying, but zero head way has taken place and everyone has come to the full conclusion of **NO CHANGE WILL TAKE PLACE IN THE DESIGN OF THE SYSTEM AND THE SERIOUS, TO LIFE THREATENING OUTAGES (911, Cell Phones, Pagers, Mobile Phones and Phones) WILL HAPPEN AGAIN** and again. **Basic design would eliminate this LIFE THREATENING hazard.**

Sincerely yours,

Gene Spineto
Manager Telecommunications

Post Office Box 700
Guthrie OK 73044-0700

E M I

MEMORY TRANSMISSION REPORT

TIME : 08-02-2000 14:57
TEL NUMBER: +14052828533
NAME : ENVIRONMENTAL MANAGEMENT

FILE NUMBER : 768
DATE : 08-02 14:54
TO : 13143312551
DOCUMENT PAGES : 009
START TIME : 08-02 14:54
END TIME : 08-02 14:57
SENT PAGES : 009
STATUS : OK

FILE NUMBER : 768

*** SUCCESSFUL TX NOTICE ***

Environmental Management, Inc.
P.O. Box 700
Guthrie, OK 73044-700

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Fax Transmittal
405.282.8533

To: Ms. Phyllis Mitchell

Company: SWB

Fax No: 314-331-2551

From: Gene Spinetto Ph. 405-282-8510 Gspinetto@emiok.com

Total number of pages including this cover page: 3

Date: 9-1-00 Time:

If pages are missing or unreadable please call 405.282.8510.

Comments: This is in reference to your phone call of 8-31-00 regarding FCC informal complaint 99-C833 and information from SWB Engineering.

Ring routing (alternate routing/Sonet) between the city of Edmond and Guthrie still leaves Guthrie and Edmond dependent on the old path from Oklahoma City (OKC) where the big outage came from the last time. The alternate route from OKC would have to go to another site before going to Edmond or Guthrie. Such as East, West or South of the CO in OKC.

Perhaps engineering should provide a map and dates of the fix. In 1999 they did not have a budget for this or a schedule. Emergency budget allocations would have a very specific accounting ID for this. But it was not presented on the final outage report and was not stated during the taped SWB conference call (seven party conference call of Feb 2, 1999). However, SWB stated that no change to routing is taking place nor scheduled and the fiber to Enid could not include Guthrie as stated in last meeting! Maybe it made the 2000 plan and budget? This can be confirmed with accounting and planning.

Phyllis, the transcript from the (seven-party) conference call will provide you with the statements from SWB.

The attached map may help explain how another line between Edmond and Guthrie does not change what happened in OKC, which is where the last major outage took place. Like having a front door and back door to a house side by side, thinking you have an alternate route out of the house.

E.M.I. has the nation's largest environmental emergency response sub-contractor network.

Second page (of three) of fax to: Ms. Phyllis Mitchell 9-1-00

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

The fact that SWB Engineering is stating that alternate routing is now installed is agreeing that they have been extremely delinquent in keeping the nations standard and SWB standard. You have accepted and acknowledged alternate routing is missing.

With the present information provided (sketchy at best from Engineering) on the fix which I question this as a fix (only two links to a chain when it would take 30 links to make the distance), it still is not even the correct type nor the correct location for a fix and it fails to meet the nations standard that SWB has accepted and endorsed with the FCC.

Ms. Mitchell, from what you have described to me as the SWB Engineering response as the fix, makes me believe you should contact a second Engineering group in another section of SWB.

Sincerely, Gene

KANSAS STATE LINE 100 MI TO
OKLAHOMA CITY

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

○ ENID

○ STILLWATER

○ GUTHRIE (30 MI NORTH
CITY OF OKLAHOMA
CITY)

○ EDMOND
CITY

← MAIN LINE (TRUNK)
1960' TO 1998'

* ○ OKLAHOMA
CITY

* NOV 18, 1998
FIBER CUT,
1/3 STATE OUTAGE

N.
MAP
8-31-00
W. ↑ E.

MEMORY TRANSMISSION REPORT

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

TIME : 09-01-2000 14:14
TEL NUMBER: +14052828533
NAME : ENVIRONMENTAL MANAGEMENT

FILE NUMBER : 630
DATE : 09-01 14:13
TO : 13143312551
DOCUMENT PAGES : 003
START TIME : 09-01 14:13
END TIME : 09-01 14:14
SENT PAGES : 003
STATUS : OK

FILE NUMBER : 630

*** SUCCESSFUL TX NOTICE ***